

MEMO ENDORSED



April 14, 2023

VIA ECF

The Honorable Edgardo Ramos
United States District Court Judge
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

The parties' request to submit another joint letter to the Court by April 24, 2023 is granted. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Edgardo Ramos".

Edgardo Ramos, U.S.D.J.
Dated: April 17, 2023
New York, New York

Re: *Haitian Bridge Alliance et al. v. U.S. Dep't of Homeland Sec. et al.*, No. 1:22-cv-08344-ER

Dear Judge Ramos:

Pursuant to the Court's Order, Dkt. No. 39, I write on behalf of all parties to provide the Court with a status report regarding the parties' progress in resolving the two Freedom of Information Act ("FOIA") requests, dated October 1, 2021 and February 25, 2022, as to defendants U.S. Department of Homeland Security ("DHS"), U.S. Customs and Border Protection ("CBP"), and U.S. Immigration and Customs Enforcement ("ICE") (collectively, the "DHS Defendants" or the "Government").

After the parties submitted a letter to this Court on March 31, 2023, Dkt. No. 38, the parties met and conferred on April 3, 2023 regarding the Government's March 30, 2023 proposal in response to Plaintiffs' February 10, 2023 search plan. On April 6, 2023, Plaintiffs sent the Government a letter detailing the Plaintiffs' questions and concerns with the Government's March 30, 2023 proposal. The Government provided a revised proposal on April 12, 2023, and Plaintiffs are considering that proposal.

The parties thus respectfully propose that they submit another joint letter to the Court by April 24, 2023, regarding whether the remaining issues have been resolved or if the Court's intervention is required because the parties have not been able to reach agreement. The parties believe they should be able to inform the Court one way or the other at that point.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Tess Hellgren

Tess Hellgren (*pro hac vice*)
INNOVATION LAW LAB
333 SW 5th Ave., Suite 200

April 14, 2023
Page 2

Portland, OR 97204
Telephone: (503) 922-3042
E-mail: tess@innovationlawlab.org

Counsel for Plaintiffs

cc: Dana Walsh Kumar and Tomoko Onozawa, Counsel for Defendants (via ECF);
Lauren Wilfong, Sarah Decker, Sarah Telo Gillman, Allison Crennen-Dunlap, Stephen
Fuzesi, Sara Fatima Dhanji, and Stephen Manning, Counsel for Plaintiffs (via ECF)